

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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GATX TECHNOLOGY SERVICES  
CORPORATION,

*Plaintiff,*

v.

COMMONWEALTH CAPITAL CORP  
and AVON PRODUCTS, INC.,

*Defendants.*

Civil Action No. 02-CV-03225

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COMMONWEALTH CAPITAL CORP,

*Plaintiff,*

v.

AVON PRODUCTS, INC.,

*Defendant and  
Third Party Plaintiff,*

Civil Action No. 01-CV-6915

v.

EL CAMINO RESOURCES, LTD.  
and GATX TECHNOLOGY SERVICES  
CORPORATION,

*Third Party Defendants.*

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**MOTION TO CONSOLIDATE**

Plaintiff GATX Technology Services Corporation (“GATX”), by and through its undersigned attorneys, respectfully moves the Court to enter an Order pursuant to Fed. R. Civ. P.

42 consolidating Case No. 02-CV-3225, GATX Technology Services Corp. v. Commonwealth Capitol Corp., with Case No. 01-CV-6915, Commonwealth Capital Corp. v. Avon Products, Inc. for the purpose of all pretrial proceedings and for trial. The two pending actions share common questions of fact and law, and consolidation would promote judicial efficiency and economy of administration, and would lessen the inconvenience of the parties.

BAZELON, LESS & FELDMAN, P.C.

By: \_\_\_\_\_

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*GATX Technology Corporation*

Dated: July 1, 2002

**CERTIFICATE OF SERVICE**

I, Noah H. Charlson, hereby certify that on this 1<sup>st</sup> day of July, 2002, I caused to be served a true and correct copy of GATX Technology Services' Motion to Consolidate, Memorandum of Law in Support of GATX's Motion to Consolidate, and Proposed Order, by first class mail postage pre-paid, upon the following

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